

MINUTES

HISTORIC PRESERVATION COMMISSION

September 13, 2023

Minutes of the regular hearing of the Historic Preservation commission, of the City of Tempe, which was held in hybrid format in person at City Council Chambers, 31 East 5th Street, Tempe, AZ, and virtually through WebEx.

Regular Meeting 6:00 PM

Present:	Staff:
Kyle Woodson	Jeff Tamulevich, Community Development Director
Dave Fackler	Zachary Lechner, Historic Preservation Officer
Jean Robinson	Ambika Adhikari, Principal Planner, Com Dev
Reylynne Williams	Jennifer Daniels, Administrative Assist II, Com Dev
Anders Engnell	
Greg Larson	
Kiyomi Kurooka	
Laurene Montero	

- 1) **Call to Audience:** Persons wishing to address the Commission on any matter may do so at the discretion of the Chair. However, Arizona Open Meeting Law Limits Commission discussion to matters listed on the posted agenda. Other topics may be placed on a future agenda for discussion.
- 2) **Voting of the Meeting Minutes for July 12, 2023**

Motion by Vice Chair Fackler to approve Meeting Minutes for July 12, 2023: second by Commissioner Larson. Motion passed on **6-0** vote.

Ayes: Chair Woodson, Vice Chair Fackler, Commissioners Engnell, Williams, Larson, and Kurooka

Nays: None

Abstain: Commissioner Robinson and Montero

Absent: Commissioner Davis

Voting of the Meeting Minutes for August 9, 2023

Commissioner Williams stated that on page 2, bottom paragraph, Dr. Lechner's name is typed two times in a row. On page 4, first paragraph the word "says" is spelled incorrectly.

Motion by Vice Chair Fackler to approve Meeting Minutes for August 9, 2023, with corrections: second by Commissioner Robinson. Motion passed on **8-0** vote.

Ayes: Chair Woodson, Vice Chair Fackler, Commissioners Engnell, Robinson, Montero, Williams, Larson and Kurooka

Nays: None

Abstain: None

Absent: Commissioner Davis

3) Approval of Agenda

Approval of Agenda by Chair Woodson.

- 4) Presentation on the Tempe Downtown Refresh initiative. The presenters are Eric Iwersen, City of Tempe Sustainability & Resilience Director, and Shelly Seyler, City of Tempe Interim Engineering & Transportation Director.

Mr. Eric Iwersen, City of Tempe Sustainability and Resilience Director, gave a presentation on the Tempe Downtown Refresh initiative. Mr. Iwersen said that he and his colleagues are preparing to go back to City Council at the end of the month with information and comments from public outreach meetings. Currently, Mr. Iwersen's team is receiving direction and feedback on the trees and sidewalk along Mill Avenue. There are 3 sidewalk concepts that are being put before the public for feedback. Concept #1 brings the most materials into the sidewalk. There has been a conversation about adding more plaques to Mill Avenue explaining what Tempe is and what Mill Avenue is. All of the sidewalk options have the ability to add those stories. Concept #2 is the closest to what sidewalk design on Mill Avenue. There are some areas where the brink is deteriorating. Mr. Iwersen said they do want to salvage as much brick as they can. The difference is in the intersections where they would be proposing concrete pavers. Concept #3 is a mix between concepts #1 and #2. It is half brick and half concrete pavers. This concept is similar to what some of the new developments have been using. One of the things we are trying to do city wide, Mr. Iwersen said, is rainfall capture. There is a new program called Rain to Roots that is launching tonight. There are some green storm water technologies, including the Silva Cell System. This will incorporate water harvesting and basins to help support the root system. Currently, Mill Avenue only has Ficus trees. There are 5 more tree types that Council has forwarded as options to accent the Ficus that already run along Mill Avenue. Mr. Iwersen's team is currently looking at 50% or 70% Ficus options. The other tree options are more resilient and drought tolerant than the Ficus. The other tree options include the Tipu, Ghost Gum, Fruitless Olive, and Mastic Tree.

Chair Woodson asked the Commissioners if they had any questions or comments.

Chair Woodson asked, based on the feedback already received, are there people saying this is what they want or is it all over the board? Mr. Iwersen stated they are still processing the feedback. At this time, it is all over the board. Regarding the trees, responses were evenly split between the 50% and 70% Ficus options. For the sidewalk, there has been a lot of support for Concept #1. Mr. Iwersen did not have final numbers at the time.

Commissioner Robinson asked if there was any thought to making Mill Avenue a fully pedestrian mall. She asked several questions: Is it bike friendly and what are the plans for a bike lane? In terms of the trees, is just drought tolerance being considered? Have you considered leaf drop, foliage height, and whether it will block store fronts or entries? Shade is also important, she said, but shade can be provided in multiple ways, and not just with tree cover. At ASU, it was found that tree cover can obscure buildings. If you are going to focus on the historic nature of the buildings, it would be good to give some thought to what you want to highlight or show. How are you going to feature the historic character of the building? Is there going to be some type of signage or marking other than what was shown in the hardscape? It would be nice to incorporate some type of art walk and historic walk/tour of downtown. Mr. Iwersen stated that the pedestrian mall idea has come up and other people have asked for the same. That is not being supported by the City at this time. He said we are seeing an evolution of Mill Avenue. It used to be a four-lane highway. There are now 11 transit routes that run along Mill Avenue into downtown. We do have bike lanes on Mill Avenue. They are 6-feet wide and utilize the green thermo plastic. Commissioner Robinson asked if there is any protected bike parking like a garage? Mr. Iwersen does not have plans for corrals. There are bike parking/racks. The City will look at that as part of the project. The street was just repaved as part of the Streetcar project. The configuration of the 2 lanes, street parking, the location of where the buses pull in and out, and bike lanes will not be changed. There were other criteria for the trees besides water conservation. The 5 trees discussed tonight are all evergreen, and that is important. Additional color, leaf color, bark color, and seasonality were all considered. There is also a variation in height with the different trees. Having

different options allows for slightly less coverage in front of certain architecture. Mr. Iwersen said the City is keeping in mind showcasing historic structures while also having a plan with the trees that makes sense. They are looking at the possibility of placing shade structures near the ends or corners of the streets where there might be extra space. There are three brass plaques in the streets today. More art features will come later. Commissioner Robinson asked if the idea is to attract people to the downtown so it can become an urban park and people can enjoy the walk down the street. She said the City should consider plants that smell good. There are a lot of trees that have flowers that smell good. The Russian Olive has a wonderful smell. Mr. Iwersen stated that there are flowering boxes along the street, and they are changed out throughout the year. That may be something that could work within those spaces.

Vice Chair Fackler stated that he liked Concept #1 in the beginning. The curves may not work in an area where everything is angular, though. If someone wanted to walk the brick stroll, they could not do it continuously. That took him away from Concept #1. Is the brick that was previously used still available from Phoenix Brick, Vice Chair Fackler asked? Will it match the bricks being rehabbed? Mr. Iwersen was unsure if the brick was available. He said the City is still researching a supplier for the brick. The idea is to salvage the good brick and put it back into the sidewalk. If the new brick does not match perfectly, it will be intermixed with the old brick. For example, similar to what was done with the Snakes and Lattes building. That will be the City's approach with Mill Avenue. Chair Fackler stated he had a concern with the colors of the old brick. There are 4 colors in Antigua brick. It is not just red brick on the street. Mr. Iwersen stated he has not heard the color-matching question come up yet. Chair Fackler stated that Concept #2 is boring, and he is warming up to Concept #3. Concept #3 should have the concrete pavers on the ends like Concept #2 does so that the Lithomosaic can be used on the corners for a pop of color. Chair Fackler asked if the gathering material shown in blue on the diagram is on the streets. Mr. Iwersen stated it would be under the streets; this is just the distribution system. It does not affect what is on top of the street. It connects to where the trees are. Chair Fackler asked if, with the tree mix, will they be starting over or are there Ficus currently out there that can survive and should stay? Mr. Iwersen stated the City is dealing with that process now. The objective is to save trees. Over half of the tree wells are currently vacant. The City is working on how the flow of the street and the trees will work.

Commissioner Robinson asked why some of the trees are dying. Are they developed trees or is it a mix? Mr. Iwersen stated that it is a mix. Ficus struggle to survive in the urban environment with heat over 115 degrees. The second issue is the 40-plus-year-old irrigation system. It is failing and becoming disconnected. The third issue is the fungus that Ficus are susceptible to and that has been going through the city. Those 3 issues have created challenges.

Commissioner Kurooka stated it does not sound like, at this stage, there is a plan for the historic properties along Mill Avenue. There is a Historic Downtown Core idea was introduced in General Plan 2050. During the next stage of this project, Commissioner Kurooka stated, she would like that to be taken into consideration. Mr. Iwersen stated that they have had very clear feedback from some of the owners of the historic properties in the area. The City is looking at how best to plant trees around those properties. The City does not have a package in place regarding the history of the street and how it is celebrated. Principal Planner Mr. Ambika Adhikari stated that General Plan 2050 is not adopted as of now and that he will give an update later. Commissioner Kurooka said that last year when the Commission was asked to review the gates on the Mill Avenue Bridge, there were some issues. Commissioner Kurooka stated that she went back to her office and asked for ideas on an improved remedy. One of the ideas she heard was to remove a driving lane each way on the bridge and to make the pedestrian sidewalk wider or into a dedicated bike lane. The desire was to have more people using the bridge as a deterrent to people sleeping in the alcoves. Commissioner Kurooka stated she would like that to be considered in a future stage of this project. Mr. Iwersen thanked Commissioner Kurooka for the ideas and feedback. Commissioner Kurooka asked about the City's future vision for Downtown Tempe. The area used to be more fun, interesting, and unique, but now it is boring. What is the idea behind the Mill Avenue Refresh? Where are we going? Mr. Iwersen stated that he does not have the answer to where we are going. Tempe's best days are ahead, he stated. He said he does not fully know what the vision will be. City Council has indicated that it wants reinvestment in and a refresh throughout the city, as well as to elevate Tempe's public spaces. Staff and City Council are trying to actively recruit different restaurants and shops back to Mill Avenue.

Commissioner Larson stated that, regarding the sidewalk, he likes the bird's eye view of Concept #1 but agrees with Vice Chair Fackler on the street view. However, he does like the Gin Blossoms mosaic and disagrees with Vice Chair Fackler about Concept #2 being boring. It is unmistakably Mill Avenue. If there was a way to incorporate some of the mosaic into Concept #2, Commissioner Larson said he'd really love that. Concept #3 does not look like it will age well. In regard to the trees, Commissioner Larson said he would support fewer Ficus. He said he likes the 50/50 split on the Ficus, which is Concept #1, better than the 70/30 split. He likes the different colors.

Commissioner Williams stated that she agrees with Commissioner Larson and Vice Chair Fackler regarding the street concepts. If the idea is to symbolically show the Salt River that goes through Tempe, it would be better to represent the actual outline of the river down the entirety of Mill Avenue, not just a ribbon of blue, which does not necessarily appear to represent the river. To Commissioner Williams, it just looks like a squiggly line. It's a geometric design and the buildings will overshadow it, and if the trees cover it from above, nobody will see anything. Displaying the actual outline of the river down the middle of the sidewalk would be one way to incorporate the surrounding elements. The Lithomosaic designs are a creative idea to identify what is specific to Tempe. The Joshua trees are not significant for this specific area. Commissioner Williams would suggest Prickly Pear and Saguaro cactus. For the trees, she would prefer anything native to Arizona. Mr. Iwersen stated that he and his team are speaking with some Indigenous artists. They are looking at how best to demonstrate or show a connection to the Butte.

Commissioner Robinson stated that when Mr. Iwersen was talking about the streetscapes for the sidewalks, he stated that Concept #3 was more in line with the newer areas that were designed. Is it a goal to try to link Mill Avenue to some of the side streets that being developed now? Mr. Iwersen stated that it is not necessarily a goal, but the City does wish to tie them together. The Community Development Department has guided the developers to pick materials that connect nicely with what the City already has. There has been integration with concrete pavers. Commissioner Robinson stated, with that in mind, she would support Concept #3 because it all ties together.

Chair Woodson stated that this is not just Mill Avenue. This is historic Mill Avenue. He does not see a need to flow into what the new developments are doing. This is a unique place, and it should stay unique. He would not like to see downtown Mill Avenue become another Tempe Marketplace. There is plenty of color, contemporary design, and fun things to do there and other places in the city. He does not think that the downtown historic core is the place for that. Everything needs to fit with the historic core nature of that part of Mill Avenue. Everyone recognizes Tempe for Mill Avenue. Chair Woodson stated that he would like to see some of the considerations for shapes, sizes, and color pallets to help preserve the feel of the historic downtown. He likes Concept #2 for the sidewalks because it is more iconic. In the report, it sounds like Concept #1 is being promoted as the preferred option. It seems like Concept #1 would be more expensive, with the colors and shapes, to implement and to maintain. Is there some consideration to future maintenance? Mr. Iwersen stated absolutely. There are big conversations about that right now. Using fewer materials is more cost effective in the long run. Chair Woodson asked, will Mr. Iwersen will be coming back to the Commission regarding this project, or is this the Commission's one opportunity tonight to weigh in? Mr. Iwersen stated that staff will be asking Council for approval. He has clear directions from Council to move this as quickly as possible. We are just giving everyone a voice before going into construction, he said. There may be some version for everyone to see and give additional feedback.

Commissioner Kurooka asked why there is a big hurry on the project. Mr. Iwersen stated that the City wants reinvestment in the downtown. Council has seen downtowns in other areas that have received reinvestment and are receiving more attention. There is also failing infrastructure along Mill Avenue. The irrigation systems need to be replaced.

Commissioner Montero echoed what Chair Woodson stated about historic Downtown Tempe. There is so little of the historic look remaining. She would like to see an attempt to preserve that look.

- 5) Presentation on the City of Tempe's *Making Space: An Equity Study for Parks and Recreation*. The presenters are Erin Kirkpatrick, City of Tempe Community Service Department Manager, and Julie Hietter, City of Tempe Community Service Department Administration Manager.

Ms. Erin Kirkpatrick, City of Tempe Community Service Department Manager, and Ms. Julie Hietter, City of Tempe Community Service Department Administration Manager, gave a presentation on City of Tempe's Making Space initiative.

The project began in July 2022. This study touches on each of City Council's five Strategic Priorities. The Parks and Recreation Division is directly responsible for 2 of the 5, Safe and Secure Communities and Quality of Life. Parks and Recreation's goal with this study is to create parks and recreation spaces that are barrier free, accessible, inclusive, and just. Diversity in City programs attracts a diversity of people and interests and makes for a robust system. The City was able to hire community navigators to help with this project. Parks and Recreation assessed City recreation facilities and 44 of its parks. The Division looked at how it feels to be in these spaces, how they are accessed, who tends to use them, and other indicators. Parks and Recreation held multiple pop-up events and utilized Arts in Parks events. In a community survey, approximately 20% of participants stated they had never engaged in a City process before. This process also involved an Equity Analysis. Parks and Recreation examined socioeconomic inequities, urban heat and shade, use and experience, and distribution and condition. There are 6 guiding principles and 21 goals in the draft document. The draft is currently online, which anyone can access and follow through the story maps. Boards and commission members can share feedback on the form provided. The public review process will begin in October.

Commissioner Engnell stated, as someone who works with GIS, the story maps are some of the best that he has seen. The recommendations are comprehensive and thorough. There is wonderful information about preserving and repurposing historic assets, showcasing local foods, and recommending certain naming practices that reflect the Indigenous communities. Are there some tactical tools or execution strategies in the report to ensure that those naming practices and historic assets are properly implemented? Will this be handed to a team that will implement those specific recommendations? Ms. Kirkpatrick stated that this Equity Study feeds into the overall Parks and Recreation Master Plan. It is hoped that some of the goals that were higher level for the Parks and Recreation Master Plan will be more strategic and action oriented in this study. The priority is being given to those that align with the overall goals and strategies of both. Parks and Recreation have a team that will be tasked with moving this project forward and that will be used almost immediately. The forthcoming Hayden Butte and Papago Park Preserves Management Plan will help to inform naming and signage.

Commissioner Williams stated she wanted to thank Ms. Kirkpatrick for including the City of Tempe's land acknowledgment and the story map in the plan because it shows that the Parks and Recreation Department is actively working toward inclusion of Native communities. In recent discussions among the Four Southern Tribes of Arizona, there has been discussion of how Papago Park received its name. If it is possible, it would be desirable to look into giving the park a more appropriate name. Another site is Indian Bend Park. It would be interesting to know the origins and history of that name. If possible, that park should also be renamed. Ms. Kirkpatrick stated that there has been input about renaming of both of those parks. The City will examine renaming in the Preserves Management Plan. Tempe has shown a desire and willingness to begin examining the historic contexts, injustices, and decisions that may have been occurred with little awareness of their potential impact on communities. One of the City's goals is to center voices that have not been heard before.

Chair Woodson stated he thought the report was superb. He said it sounds like Parks and Recreation is trying to take the feedback into consideration and that the study is moving in the right direction. Ms. Kirkpatrick stated that as the plan moves to the public comment period in October, the City will inform the community, letting people know how to access and share feedback on the plan. Chair Woodson stated that

any place you can have some enhancements or signage that enable people to learn more about the City's and the larger area's Indigenous history would help to create a great educational opportunity.

- 6) Discussion of proposed amendments to City Code, Ch. 14A (Historic Preservation Ordinance). The presenter is Zachary J. Lechner, City of Tempe Historic Preservation Officer.

Dr. Zachary Lechner gave a presentation on the proposed amendments to City Code, Chapter 14A. The purpose of amendments is to fulfill priorities in the Historic Preservation Plan (2022), clarify requirements and procedures, and make minor textual changes. Some of the key proposed changes are changing the maximum length of stays on issuing demolition permits for Historic properties from 180 to 365 days and Historic Eligible properties from 30 days to 60 days, as well as imposing a maximum stay of 60 days on issuing demolition permits for all properties 50 years or older. Other proposed updates include revising and clarifying information in the "Violations" section of the ordinance, waving application fees to designate a property in the Tempe Historic Property Register, expanding the definition of "Archaeologically Sensitive," aligning notifications requirements in the Historic Preservation Ordinance with those in the Zoning Development Code, and aligning language related to filing protests against a proposed historic district with the procedures mandated in A.R.S. 9-462.04(H).

This presentation to HPC is the first step in the process. This proposal will be coming back to the HPC in November with a staff request for recommendation of adoption. It would then go to City Council for 2 hearings, November 30 and December 21.

Commissioner Larson stated that he has several comments. In the definition section, he said it would be prudent to explore expanding a couple of the definitions, including "alteration." He said, I am looking at this one as being limited to the exterior surface of any significant part of a designated property. It seems that the preservation of a property should expand beyond just the exterior surface. He said he understand that it includes an architectural, mechanical, or structural change, but there seems to be an opportunity for better historic preservation with an expanded definition of "alteration." Dr. Lechner stated that if someone requests a Certificate of Appropriateness, it is only required for alterations to the exterior of the property, it does not impact any changes to the interior of the property. He said, I believe that is the reason for the current definition. Larson stated that it may not be possible to expand the definition, but it is something to consider. It might facilitate more opportunities for historic preservation if that definition were expanded. The next definition Commissioner Larson said he would consider expanding is that of "demolition." It is short, and it is defined as a process that destroys a designated property. It could be expanded to say something like destroys even a portion of a designated property. Full demolition isn't necessarily required for the historic nature of a property to be affected. There may be some better opportunity for historic preservation with an expanded definition. In addition, the definition of "preservation easement" can be written more clearly. Commissioner Larson said it may be necessary to consult with the City Attorney's Office on that definition, since it's technical. The way it's worded right now is a little vague and ambiguous. A preservation easement in terms of historic preservation is a valuable tool to give the City the authority to preserve a property. The definition can be worded in such a way that is clearer. Commissioner Larson said he has ideas on how to do that, and he's happy to suggest them. Dr. Lechner said Commissioner Larson could send those suggestions to him. Commissioner Larson referenced Section 14A-4, Subsection D (page 8 of 17), in regard to notifications for public hearings for designating a landmark, historic property, or historic district. Subsection D appears to increase or double the radius of the notice provided for a proposed landmark or Historic property, which would seem to increase the cost of preservation, Commission Larson said. The added language is generally fine, but he wondered, why would the City double the radius of the public notice? Dr. Lechner stated that is the requirement in the Zoning and Development Code for a Zoning Map Amendment, which is what a historic designation requires. The City is just proposing to bring the HP Ordinance into alignment with the rest of City Code. Dr. Lechner said that the Planning Division has been handling a lot of the notification requirements on behalf of applicants for designating historic properties, and he envisions that this will continue, unless the HPO starts receiving a flood of designation requests. Commissioner Larson stated there is another section of the Code that cross references A.R.S. 9-462.04(H), indicating that this is the process for how the City must address objections. Rather than including the relevant Zoning and Development Code language, perhaps just cross-referencing the HP Ordinance with the Zoning and

Development Code would be a more effective way to bring the historic preservation code and zoning ordinance in alignment. If the Zoning and Development Code changes, then it will automatically remain aligned with the HP Ordinance without having to amend the HP Ordinance. Dr. Lechner stated that the reason the HPO is proposing to spell it out is because a reference to specific historic properties or districts is being proposed for the HP Ordinance, which is not a part of the Zoning and Development Code language. Commissioner Larson stated on Page 14, Section 14A-9, Subsection D, there is an addition of the word "are." There needs to be an infinitive there. Commissioner Larson said that wording on Page 15, Section 14A-11, Subsection C, needs to be reworded. This gives the Historic Preservation Office the authority to lodge a complaint with the Registrar of Contractors (ROC) and issue a formal notification to SHPO if a property is demolished improperly, or if the HP Ordinance is violated. That section needs to be worded more clearly. Dr. Lechner stated that Commissioner Larson can email him recommendations on how to reword it.

Commissioner Williams stated that under the "archeologically sensitive" definition, "Tribal Nation" instead of "Tribal Government" likely should be used, though consultation with the City Attorney's Office would be advisable. Dr. Lechner stated that he did receive initial feedback from the City Attorney's Office, and it was in full agreement with Commissioner Williams's suggestion. Commissioner Williams stated she did not know if there would need to be a definition added for "Tribal Nation," as some people may not understand what a Tribal Nation is, since the word "Tribal" is used in various spaces and not just by Native American communities. Dr. Lechner stated that he would get the City Attorney's Office feedback on that suggestion, too. Commissioner Williams stated that on Page 13, Section H, there is a discrepancy in the proposed increased maximum period for imposing a stay on a demolition permit request.

Commissioner Kurooka stated that she likes the general idea of keeping buildings intact but a building over 50 years will soon include all of the houses built in the 70s and 80s. What is the criteria that will be used to assess those demolition permit applications, she asked? Dr. Lechner stated this is something the City of Phoenix does. It is going to have to be taken on a case-by-case basis. Often individual homes are not historically significant, since they are not associated with historic individuals or events, and the architecture is not distinctive. Dr. Lechner said the HPO is not automatically going to place a 60-day stay of demolition on every request it receives for a property that is 50 years or older. That is just the maximum that would be allowed. If the property lacks sufficient historic integrity, then the demolition permit request can be issued without further delay.

7) Chair / Staff Updates

Mr. Adhikari updated the Commission on General Plan 2050. The plan was passed unanimously by City Council to go before the voters next year.

Dr. Lechner updated the Commission on the City's General Historic Properties Treatment Plan. The plan was adopted unanimously by City Council at its September 7, 2023, meeting.

Chair Woodson asked Dr. Lechner if there were any updates on the Watson's Flowers Building? Dr. Lechner stated that the City Manager asked for Community Development to arrange for a building condition assessment to be completed to determine if there was any potential for adaptively reusing the building. The City is still in conversation with TCAA and nothing has been set at this point.

Chair Woodson asked if there was a new City Manager. Dr. Lechner stated, yes, it is Ms. Rosa Inchausti, who he said is very supportive of historic preservation.

8) Current Events / Announcements / Future Agenda Items

Member Announcements

Staff Announcements

Commissioner Kurooka asked Dr. Lechner if the Commission could do anything to help with the Historic Preservation bond issue that might be on Tempe's 2024 elections ballot. Dr. Lechner stated that at this time he had no additional information to share. A discussion took place at a recent City Council executive

session. Dr. Lechner was not part of that discussion, and, due to it being an executive session, what was discussed cannot be shared with the Commission. Commissioner Kurooka asked if Dr. Lechner was involved in the process. Dr. Lechner said it's very possible that he would be in the future.

Chair Woodson stated that the HP conference will be held in Tucson on October 26th and 27, if anyone is interested in going. Dr. Lechner stated he will be attending.

Dr. Lechner said there are currently no agenda items for the October HPC Meeting. There will be a meeting in November.

Meeting Adjourned by Chair Woodson.

Hearing adjourned at 8:34 PM

Prepared by: Jennifer Daniels, Administrative Assistant

Reviewed by: Zachary Lechner, Historic Preservation Officer

jd:zl